IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
JOANN INC., et al.,	Case No. 25-10068 (CTG)
Debtors. ¹	(Jointly Administered)
	Obj. Deadline: May 12, 2025 at 4:00 p.m. (ET) Hearing Date: May 21, 2025 at 10:00 a.m. (ET)

NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) APPROVING CLOSING AGREEMENT WITH UNITED STEELWORKERS AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on April 28, 2025, the above-captioned debtors and debtors in possession (the "<u>Debtors</u>") filed the *Debtors' Motion for Entry of an Order* (*I) Approving Closing Agreement with United Steelworkers and (II) Granting Related Relief* (the "<u>Motion</u>") with the United States Bankruptcy Court for the District of Delaware (the "<u>Court</u>").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **May 21, 2025 at 10:00 p.m.** (**prevailing Eastern Time**) before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order granting the relief sought in the Motion must be made in writing and filed with the Court on or before **May 12, 2025 at 4:00 p.m.** (**prevailing Eastern Time**) (the "Objection Deadline"). At the same time, you must serve a copy of the response or objection upon the undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO PROPERLY FILE AND SERVE A RESPONSE ON OR BEFORE THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Dated: April 28, 2025 Wilmington, Delaware

/s/ Jack M. Dougherty

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451) Stacy L. Newman (No. 5044) Michael E. Fitzpatrick (No. 6797) Jack M. Dougherty (No. 6784) 500 Delaware Avenue, Suite 600 Wilmington, Delaware 19801

Telephone: (302) 652-3131 Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

snewman@coleschotz.com mfitzpatrick@coleschotz.com jdougherty@coleschotz.com

KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*) Aparna Yenamandra, P.C. (admitted *pro hac vice*) 601 Lexington Avenue

New York, New York 10022 Telephone: (212) 446-4800 Facsimile: (212) 446-4900

Email: joshua.sussberg@kirkland.com

aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*) Jeffrey Michalik (admitted *pro hac vice*) Lindsey Blumenthal (admitted *pro hac vice*)

333 West Wolf Point Plaza Chicago, Illinois 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Email: anup.sathy@kirkland.com

jeff.michalik@kirkland.com lindsey.blumenthal@kirkland.com

Co-Counsel to the Debtors and Debtors in Possession

Co-Counsel to the Debtors and Debtors in Possession